Case 2124-bk-12532-BR Doc 19 Filed 09/27/24 Entered 09/27/24 15:03:06 Page 1 of 12 Main Document FILED 1* SEP 27 2024 Dr. Stewart Lucas Murrey 1 1217 Wilshire Blvd. # 3655 CLERK U.S. BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
BY: Deputy Clerk Santa Monica, CA 90403 Tel.: (424) 278-3017 Email: 2@lucasmurrey.io 3 Website: lucasmurrey.com SocialMedia: sickoscoop.com/lucas Plaintiff & Plaintiff in Pro Se 5 6 UNITED STATES BANKRUPTCY COURT 7 CENTRAL DISTRICT OF CALIFORNIA 8 9 In re: Bankruptcy Case No. 24-bk-12532-BR-Chapter 7 10 MS. AMY LYNNE BLALOCK, an [Assigned to: Hon. Judge Barry Russell] individual; 11 Debtor. DR. MURREY'S REPLY IN 12 SUPPORT OF HIS MOTION FOR 13 ORDER CONFIRMING NO STAY IN EFFECT; OR, IN THE 14 ALTERNATIVE, RELIEF FROM 15 **STAY** 16 Hearing Date: 17 **Hearing Time:** Courtroom: 1668 18 Hon. Barry Russell Judge: 19 20 Ms. Blalock's opposition is frivolous, as she fails to address the issues at 21 hand. Recently, the state LASC case granted Dr. Murrey's motion to deem requests 22 for admission admitted and there is currently evidence under oath that Facebook 23 paid Blalock's co-conspirators to cyberbully him for years in secrets to tens of 24 millions of users (a copy of the state court's ruling is hereto attached as Exh. "A"). 25 As evidence continues to develop a forthcoming amendment to the state case is 26 underway that will include Facebook and other platforms alongside individual 27 defendants such as Blalock who severely harmed his life. 28

Dr. Murrey's Reply

Given the complexity of this case as it develops in its early stages, that plaintiff has a right to have a trial by jury and that isolating one defendant from others when the issue at hand is a conspiracy, it is reasonable that this case should be heard in the original state court wherein it was filed alongside other co-conspirators and accomplices. If it remains in federal court plaintiff will first have to file a motion for leave to amend in this court and to proceed as best as possible given this new complex material to litigate against a defendant needlessly separated from the context of the harm she caused with her co-conspirators through no fault of plaintiff.

Therefore, Dr. Murrey respectfully requests this court remand the litigation of this case back to the original state court wherein it continues to proceed.

DATED: 26 September 2024

Respectfully submitted,

/s/ Stewart Lucas Mur

By:

Dr. Stewart Lucas Murrey
Plaintiff & Plaintiff in Pro Se

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EXHIBIT A

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES Civil Division

Central District, Stanley Mosk Courthouse, Department 61

23STCV14890 STEWART LUCAS MURREY vs KELLY GIBBONS, et al. September 10, 2024 10:00 AM

Judge: Honorable Lynne M. Hobbs Judicial Assistant: V. Trujillo Courtroom Assistant: D. De Leon CSR: None ERM: None

Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): No Appearances
For Defendant(s): No Appearances

Other Appearance Notes: Plaintiff Stewart Lucas Murrey, appearing via LACC

NATURE OF PROCEEDINGS: Hearing on Motion to Deem Request for Admissions Admitted

The Court's tentative ruling is electronically posted on the Court's website before the hearing is held.

The matter is not called for hearing.

Plaintiff submits to the Court's tentative. No opposition is filed.

After considering the moving papers and all documents relating to the motion, the Court adopts its tentative ruling as the final ruling of the Court as follows:

The Motion to Deem RFA's Admitted filed by Stewart Lucas Murrey on 07/12/2024 is Granted.

TENTATIVE

Plaintiff Stewart Lucas Murrey's Motion to Deem Matters Admitted against Defendant Kelly Gibbons is GRANTED.

DISCUSSION

"Any party may obtain discovery . . . by a written request that any other party to the action admit the genuineness of specified documents, or the truth of specified matters of fact, opinion relating to fact, or application of law to fact. A request for admission may relate to a matter that is in controversy between the parties." (Code Civ. Proc., § 2033.010.) If a party fails to serve a timely response to requests for admissions, "[t]he requesting party may move for an order that the genuineness of any documents and the truth of any matters specified in the requests be deemed admitted, as well as for a monetary sanction" (Code Civ. Proc., § 2033.280 subd. (b).)

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES Civil Division

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Judge: Honorable Lynne M. Hobbs Judicial Assistant: V. Trujillo CSR: None ERM: None

Courtroom Assistant: D. De Leon

Deputy Sheriff: None

Plaintiff Stewart Lucas Murrey (Plaintiff) served requests for admission upon Defendant Kelly Gibbons on February 13, 2024. (Murrey Decl. ¶ 22.) Gibbons has provided no responses. (Gibbons Decl. ¶ 24.)

Given Defendant's failure to provide responses, Plaintiff has demonstrated entitlement to an order deeming the requests admitted. Defendant has filed no opposition.

The motion is therefore GRANTED.

Plaintiff to provide notice.

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1	of Code of Civil Procedure § 2033.010 with respect to this Request of Admissions, each of the	
2	matters of which an admission is requested will be deemed admitted.	Ì
3	<u>REQUESTS</u>	
4	REQUEST FOR ADMISSION NO. 1:	
5	Admit that you swiped to match with plaintiff on the dating app Hinge because you were	
7	attracted to him.	
8	REQUEST FOR ADMISSION NO. 2:	
9	Admit that after matching with plaintiff on Hinge he made it clear to you that he was not	
10	interested in dating you.	
11	REQUEST FOR ADMISSION NO. 3:	
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13	Admit that you have never met plaintiff in person.	
14	REQUEST FOR ADMISSION NO. 4:	(
15 16	Admit that you reported plaintiff to Hinge.	
17	REQUEST FOR ADMISSION NO. 5:	
18	Admit that you posted images of plaintiff, his mobile number, his texts, the name of his	
19	girlfriend who passed from cancer in 2018, articles and videos from plaintiff's personal copyrighted	
20	website, all without plaintiff's consent in online groups, including, but not limited to the Facebook	
21	group "Are We Dating The Same Guy? / Los Angeles" ("AWDTSG/LA").	
22	REQUEST FOR ADMISSION NO. 6:	
23	Admit that you never informed plaintiff of the existence of said Facebook group	
24 25	AWDTSG/LA.	
26	REQUEST FOR ADMISSION NO. 7:	
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Gofundme.com within the last five (5) years.

REQUEST FOR ADMISSION NO. 10:

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Admit that all your comments about plaintiff in the Facebook group AWDTSG/LA have been deleted.

REQUEST FOR ADMISSION NO. 11:

Admit that you made anonymous online statements and/or posts about plaintiff.

REQUEST FOR ADMISSION NO. 12:

Admit that you posted in AWDTSG/LA that plaintiff is under "murder suspicion".

REQUEST FOR ADMISSION NO. 13: 20

Admit that you posted in AWDTSG/LA that plaintiff has filed "extortion lawsuits".

REQUEST FOR ADMISSION NO. 14:

Admit that you posted in AWDTSG/LA that plaintiff has engaged in "[f]raudulent behavior [which] includes but is not limited to using a false identity or posing a significant risk of attempting to obtain money from other users through deceitful means".

REQUEST FOR ADMISSION NO. 15:

-3-Requests for Admissions to Defendant Kelly Gibbons

Admit that you posted emojis in AWDTSG/LA in support of statements suggesting plaintiff's, 1 2 Ph.D is fraudulent. 3 **REQUEST FOR ADMISSION NO. 16:** 4 Admit that you posted in AWDTSG/LA that plaintiff is a "sociopath" and "narcissist" and 5 given to "violent mood swings". 6 **REQUEST FOR ADMISSION NO. 17:** 7 Admit that you co-authored anonymous posts about plaintiff, including, but not limited to the 8 9 post about plaintiff in the Facebook group "DON'T DATE". 10 REQUEST FOR ADMISSION NO. 18: 11 Admit that you aggressively promoted threads about plaintiff in various online groups 12 wherein you made hundreds of posts, comments and/or replies. 13 REQUEST FOR ADMISSION NO. 19: 14 15 Admit that you posted in AWDTSG/LA in response to Lena Vanderford that plaintiff has 16 'zero followers lol" in regard to plaintiff's Instagram account. 17 **REQUEST FOR ADMISSION NO. 20:** 18 Admit that you conspired with others to "cancel" plaintiff from any and all social media and 19 dating platforms, including, but not limited to Facebook, Instagram, Twitter, Google, Matchgroup, 20 21 Hinge, Tinder, OkCupid, Bumble, Raya, Upward. 22 REQUEST FOR ADMISSION NO. 21: 23 Admit that you conspired with others to degrade images of plaintiff from plaintiff's personal 24 website wherein plaintiff is seen wearing a humorous t-shirt that says: "CIA / Approved News / The 25 Most Trusted Name in Propaganda" in online groups, including, but not limited to the Facebook 26

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group AWDTSG/LA.

REQUEST FOR ADMISSION NO. 22:

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Admit that you conspired with others in online groups including, but not limited to the Facebook group AWDTSG/LA to suggest that plaintiff "unmatched people to make it harder to report him" on dating platforms.

REQUEST FOR ADMISSION NO. 23:

Admit that you conspired to give credibility to false and harmful online statements by others, including, but not limited to Paige Cone, who made false and harmful statements about plaintiff's sexual history and behavior.

REQUEST FOR ADMISSION NO. 24:

Admit that you violated the rules of public safety, electronic harassment, cyberbullying, gang-stalking and defamation on Facebook, Instagram and their groups such as AWDTSG/LA and/or online dating apps, including, but not to Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward.

REQUEST FOR ADMISSION NO. 25:

Admit that you have participated in electronic harassment, cyberbullying, gang-stalking and defamation of third parties such as plaintiff.

Date: 13 February 2024

Bv:

Dr. Stewart Lucas Murrey 1217 Wilshire Blyd. # 3655 Santa Monica, CA-90403 Tel.: (424) 278-3017 Email: 2@lucasmurrey.io Websites: sickoscoop.com/lucas,

lucasmurrey.com

Plaintiff & Plaintiff In Pro Per

PROOF OF SERVICE

I declare as follows:

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I am over the age of 18 years, and not a party to this action. My business address is 5478 Wilshire Blvd., Suite 223, Los Angeles, CA 90036, which is located in the county where the mailing described below took place. On 26 September 2024 I served the foregoing document(s) described as: Dr. Murrey's reply in the matter of Blalock's bankruptcy case no. 24-bk-12532-BR-Chapter 7 (related adv. Complaint Dr. Murrey v. Blalock case no. 24-ap-01152-BR) to:

Amy Lynne Blalock 1619 N La Brea Ave #509 Los Angeles, CA 90028 Tel. (310) 569-6182 amyblalock@gmail.com

I served a true copy of the document(s) above:

12 | [] By United States mail. I enclosed the documents in a sealed envelope or package addressed to the person(s) at the address(es) mentioned above and:

[] placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage full prepaid.

[X] By e-mail or electronic transmission. Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent to the person(s) at the e-mail address(es) listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[] I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

[X] I hereby certify under the penalty of perjury that the foregoing is true and correct. Executed on 26 September 2026 at Los Angeles, California.

/s/Alexander J. Petale, Esq.

Declarant

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PROOF OF SERVICE STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

2 I am employed in the county of Los Angeles, State of California, I am over the age of 18 and not a party to this action. My business address is: 1217 Wilshire Blvd. # 3655, Santa Monica, CA 3 90403. 4 On 13 February 2024 I served the foregoing documents in the matter of Dr. Murrey v. Gibbons et al. (Case No. 23STCV14890) described as: Plaintiff's Requests for Admission: 5 Michal Ofek Kelly Gibbons 9015 Burton Way # 304 2121 Crenshaw Blvd. Los Angeles, CA 90048-3737 Los Angeles, CA 90016 Tel.: (310) 709-1637 Tel.: (803) 360-4816 8 Email: ofek.michal@gmail.com Vanessa Valdes Amy Blalock 1825 Ivar Ave. Apt. 312 455 Nectar Rd. Los Angeles, CA 90028 10 Ty Ty, GA 31795 Tel.: (818) 632-9258 Tel.: (310) 569-6182 Email: vanessav@tcrindustries.com 11 Email: amyblalock@gmail.com 12 By Mail: XXX . 13 I deposited such envelopes in the mail at Los Angeles, California, 90036, the envelope was mailed with first class postage thereon, fully prepaid. 14 15 , I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. Under that practice the above described documents would be deposited 16 in the US Mail on that same day with postage thereon, first class, fully prepaid, in the ordinary course of business. I am aware that on motion of the party affected that service is presumed invalid if the 17 postage meter date or postmark is more than one day after the date stated for deposit in the mail 18 thereon. 19 By Personal Delivery, Handing a copy to: _____, I caused to be delivered the above described documents, by hand to the address shown above on the date stated herein. 20 21 By Fax Transmission: ____, I caused above described documents to be sent by Facsimille transmission to the following Attorneys/Parties at the following FAX Telephone numbers: 22 23 By Email: _XXX_. 24 I declare under penalty of perjury, under the laws of the State of California that the foregoing is true 25 and correct. 26 Executed on 13 February 2024 27 28